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*Attorneys for Defendant
Experian Information Solutions, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CATHERINE NICHOLS,

Plaintiff,

vs.

CREDIT UNION 1; and EXPERIAN
INFORMATION SOLUTIONS, INC.,

Defendants.

Case No.: 2:17-cv-02337-APG-GWF

**STIPULATION FOR EXTENSION OF
TIME TO RESPOND TO MOTION TO
COMPEL AND FOR POSTPONEMENT
OF THE HEARING ON THE SAME**

(First Request)

Pursuant to LR 6-1, Plaintiff CATHERINE NICHOLS (“Plaintiff”) and Defendants
CREDIT UNION 1 (“Credit Union”) and EXPERIAN INFORMATION SOLUTIONS, INC.,

1 (“Experian”) (collectively, the “Parties”), by and through their counsel of record, hereby
2 stipulate that Experian may have until Thursday, October 18, 2018, to file a response to
3 Plaintiff’s Motion to Compel (ECF Dkt. 51), that Plaintiff be granted until October 25 to file any
4 reply, and that the motion be heard on October 29-30. Pursuant to LR 7-2(b), Experian’s
5 response is presently due September 18, 2018. The Parties also request that the Court continue
6 the hearing on the Motion to Compel, presently scheduled for October 4, 2018 (ECF No. 55), to
7 accommodate the extended response date. This is the Parties’ first request to extend these dates.
8 Plaintiff’s Motion to Compel addresses very complex issues relating to Experian’s internal
9 computing systems and ability, or inability, to ascertain Plaintiff’s class. In light of these
10 complex and detailed issues, the extension of the response and hearing dates will allow Plaintiff
11 and Experian to consider alternate means of resolving, narrowing, or otherwise addressing their
12 discovery dispute, allowing the Court to conserve its limited resources. Additionally, this time
13 will permit Experian to garner additional information necessary to fully respond to Plaintiff’s
14 Motion to Compel.
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This stipulation is made in good faith and not for purposes of delay.

IT IS SO STIPULATED.

Dated: September 7, 2018

KNEPPER & CLARK LLC

/s/ Miles N. Clark

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ORDER

IT IS SO ORDERED


United States Magistrate Judge

Dated: 9/10/2018